

**UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF MISSOURI**

IN RE:)
James Stanley Panus,) Case No. 20-41182-can13
)
Debtor.)

DEBTOR'S RESPONSE TO TRUSTEE'S MOTION TO DENY CONFIRMATION

Come now the Debtor, James Stanley Panus, by and through his attorney, Tracy L. Robinson, and for his response to the Trustee's Motion to Deny Confirmation states as follows:

1. Admits allegations in paragraph one (1), and by way of further response the Debtor states counsel's EMA should be adjusted to \$110.00 per month in order to resolve the violation of §1322(a)(1).
2. Admits allegations in paragraph one (1), and by way of further response the Debtor states he fell behind with his Chapter 13 Plan payments because he is self-employed and a job, he was supposed to start had to be postponed because of the COVID 19 pandemic. Furthermore, he states that he will pay \$4,500.00 before the end of September and will work bring the rest of the delinquency current.

WHEREFORE, Debtor requests this Court dismiss the Trustee's Motion to Deny Confirmation without prejudice or in the alternative, Debtor requests that this matter be set for hearing.

Respectfully submitted,

/s/ Tracy L. Robinson
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Attorney for the Debtor

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the Debtor's Response to the Trustee's Motion to Deny Confirmation was served, in addition to the parties notified by the US Bankruptcy Court's electronic notification, upon the affected creditors and other parties in interest via U.S. First Class Mail, postage prepaid, this 2nd day of October 2020.

James Stanley Panus
7 U Street
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LVNV Funding LLC
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PO Box 10587
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/s/ Tracy L. Robinson
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